

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

*IN RE NEW JERSEY TAX SALES  
CERTIFICATES ANTITRUST LITIGATION*

Master Docket No.  
3:12-CV-1893-MAS-TJB

**NOTICE OF MOTION TO DISMISS**

**Oral Argument Requested**

TO: LITE DEPALMA GREENBERG, LLC  
Bruce D. Greenberg  
Steven J. Greenfogel  
Two Gateway Center, Suite 1201  
Newark, New Jersey 07102-5003

*Interim Liaison Counsel*

HAGENS BERMAN SOBOL SHAPIRO LLP  
Steve W. Berman (admitted *pro hac vice*)  
1918 Eighth Avenue, Suite 3300  
Seattle, WA 98101

HAGENS BERMAN SOBOL SHAPIRO LLP  
Jason A. Zweig (admitted *pro hac vice*)  
One Penn Plaza, 36th Floor  
New York, NY 10119

HAGENS BERMAN SOBOL SHAPIRO LLP  
Jennifer F. Connolly (admitted *pro hac vice*)  
629 K Street, NW, Suite 300  
Washington, DC 20006

HAUSFELD LLP

Michael D. Hausfeld (admitted *pro hac vice*)

James Pizzirusso (admitted *pro hac vice*)

Seth R. Gassman (admitted *pro hac vice*)

1700 K Street, NW, Suite 650

Washington, DC 20006

*Interim Class Counsel*

**PLEASE TAKE NOTICE** that on Monday, June 3, 2013, or upon a date and time chosen by the Court, the undersigned counsel for Defendants Royal Tax Lien Services, LLC, Royal Bancshares of Pennsylvania, Inc. and Royal Bank America shall move before this Court at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 for an Order dismissing Plaintiffs' Consolidated Master Class Action Complaint with prejudice pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a claim as to those Defendants.

**PLEASE TAKE FURTHER NOTICE** that, in support of this Motion, Defendants Royal Tax Lien Services, LLC, Royal Bancshares of Pennsylvania, Inc. and Royal Bank America rely on the Brief submitted herewith, Defendants' Joint Brief in Support of Motion to Dismiss (Docket No. 174) and any Reply Briefs filed hereafter.

**PLEASE TAKE FURTHER NOTICE** that Defendants Royal Tax Lien Services, LLC, Royal Bancshares of Pennsylvania, Inc. and Royal Bank America request oral argument if opposition to this Motion is filed.

A Proposed Order granting the Motion to Dismiss of Defendants Royal Tax Lien Services, LLC, Royal Bancshares of Pennsylvania, Inc. and Royal Bank America is attached.

Respectfully submitted,

Dated: March 8, 2013

/s/ R. Brendan Fee

Steven A. Reed (*pro hac vice*)

[sreed@morganlewis.com](mailto:sreed@morganlewis.com)

R. Brendan Fee (RF-4838)

[bfee@morganlewis.com](mailto:bfee@morganlewis.com)

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: (215) 963-5000

Facsimile: (215) 963-5001

-and-

Scott A. Stempel (*pro hac vice*)

[sstempel@morganlewis.com](mailto:sstempel@morganlewis.com)

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, NW

Washington, DC 20004

Telephone: (202) 739-3000

Facsimile: (202) 739-3001

*Counsel for Defendants,*

Royal Tax Lien Services, LLC, Royal

Bancshares of Pennsylvania, Inc. and Royal

Bank America

**CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2013, a true and correct copy of the foregoing Notice of Motion to Dismiss of Defendants Royal Tax Lien Services, LLC, Royal Bancshares of Pennsylvania and Royal Bank America was filed electronically with the Court, and served on counsel of record via electronic filing.

/s/ R. Brendan Fee  
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*Counsel for Defendants*

Royal Tax Lien Services, LLC, Royal  
Bancshares of Pennsylvania, Inc. and  
Royal Bank America